

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
EASTERN DIVISION**

LuAnne Janssen, as Personal Representative of the  
Estate of Warren S. Lindvold,

Plaintiff,

vs.

Case No. 3:19-cv-79

City of Valley City,  
Christopher Olson,  
Wade Hannig,  
Barnes County,  
Barnes County Sheriff Randy McClaflin,  
Julie Forsman,  
Jenna Jochim,  
Richard Chase,  
Bruce Potts,  
Jesse Burchill,  
Barnes County Ambulance, Inc.,  
National Medical Resources, Inc.,  
Mercy Hospital of Valley City d/b/a CHI Mercy  
Health,

Defendants.

**PLAINTIFF'S MOTION FOR A  
COURT ORDER DIRECTING THE  
UNIVERSITY OF NORTH  
DAKOTA'S SCHOOL OF  
MEDICINE AND HEALTH  
SCIENCES: DEPARTMENT OF  
PATHOLOGY TO RELEASE  
CONFIDENTIAL RECORDS  
RELATED TO  
WARREN LINDVOLD'S AUTOPSY**

1. Plaintiff, LuAnne Janssen as the Personal Representative of the Estate of Warren S. Lindvold moves the Court for a Court Order directing to the University of North Dakota's School of Medicine and Health Sciences: Department of Pathology to release confidential records, including any and all audio or visual materials, including but not limited to photographs and other visual images, video recordings, and audio recordings created or taken during the autopsy of Warren S. Lindvold on July 21, 2018 and the results of any and all toxicological testing or other testing completed with specimens / samples obtained from Warren S. Lindvold during or following his autopsy.

2. Further Plaintiff requests that its Order allow Plaintiff to disclose any confidential information obtained from the University of North Dakota's School of Medicine and Health Sciences: Department of Pathology related to the autopsy of Warren S. Lindvold on July 21, 2018 to the Defendants in this case pursuant to Rule 26 of the Federal Rules of Civil Procedure.

3. Dated this 15<sup>th</sup> day of July, 2020.

/s/ Alan Baker

Alan Baker (ND ID #04122)  
Southwood Plaza, Ste., 202  
1336 25th Ave. S.  
Fargo, ND 58103  
Telephone: 701-630-1846  
al@elawpros.com  
*Attorney for Plaintiff*

/s/ Rachel M. Gehrig

Rachel M. Gehrig (ND ID 06869)  
Cash H. Aaland (ND ID 04686)  
Aaland Law Office, Ltd  
415 11th St. S.; P.O. Box 1817  
Fargo, ND 58107-1817  
Telephone: 701-232-7944  
officemanager@aalandlaw.com  
*Attorneys for Plaintiff*